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AUTHOR Bregman, Ralph
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ABSTRACT

Observations and recommendations of the National Advisory Council on Vocational Education (NACVE) are presented based on its participation in a series of management evaluation reviews designed to assess the degree of state compliance with the requirements of current law, P.L. 90-576 (the Vocational Education Amendments of 1968). Section 1 reviews the role of the council in conducting reviews in ten states and reports that three of them were out of compliance in two areas or less and one was found to be deficient in five compliance areas. Section 2 summarizes ways in which each state sought to avoid unnecessary duplication between postsecondary and adult vocational education. A third and fourth section summarize the opinions of state advisory council personnel regarding (1) specific operational aspects of vocational education which need independent evaluation, (2) areas in which NACVE can provide technical assistance to state and local councils, and (3) specific problem areas not specifically related to compliance (e.g., need for council records to be periodically audited and need for study of balance or parity of funding between secondary and postsecondary education systems). A final section presents recommendations to the Bureau of Occupational and Adult Education, the state advisory councils and NACVE regarding their different roles or responsibility for specific management or evaluation functions. The questionnaire used in the state management reviews is appended. (JT)

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A Final Report of the National Advisory Council On Vocational Education

by the Task Force on Management Evaluation Review for Compliance

T. A. Jackson, *Task Force Chairperson*
Russell H. Graham
Caroline Hughes
Margo L. Thornley *(term expired January 1977)*

Report prepared by: Ralph Bregman
Graphics by: Linda I. McKisson

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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425 Thirteenth Street, N.W., Suite 412, Washington, D.C. 20004

Report No. 1

The National Advisory Council on Vocational Education was established under the Vocational Education Amendments of 1968, and continued under the Vocational Education Amendments of 1976. Its members, representing business, labor, education, various groups with special needs, and the general public are appointed by the President. Its responsibilities are to advise the President, Congress, the Secretary of Health, Education and Welfare, the Commissioner of Education and the heads of other departments and agencies concerning the operation of vocational education and related programs, to make independent evaluations of such programs, and to issue reports on their findings and recommendations. There is cross-representation between the National Advisory Council and the National Commission for Manpower Policy, both of which are required to identify the vocational education, employment, and training needs of the nation, and assess the extent to which vocational education, employment and training programs and other related programs represent a coordinated approach to meeting those needs.

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Irene E. Portillo
Roman Pucinski
Arthur F. Quern
Roger Semerad
Kenneth M. Smith

Reginald E. Petty, *Executive Director*

National Advisory Council on Vocational Education

425 Thirteenth Street, N.W., Suite 412
Washington, D.C. 20004
(202) 376 8873
John W. Thiele, *Chairman*
Reginald E. Petty, *Executive Director*

Honorable Joseph A. Califano
Secretary, Department of Health, Education & Welfare

In the pursuit of its obligations, the Office of Education has been conducting a series of Management Evaluation Reviews designed to assess the degree of State compliance with the Vocational Education regulations and laws. At the request of the Office of Education, the National Advisory Council on Vocational Education has participated in ten of the most recent reviews.

This Report contains the observations and recommendations of the National Advisory Council resulting from its cooperative involvement in these reviews. The Council is confident that the data compiled in this Report will prove a valuable contribution to effectively improving the delivery system for vocational education throughout the Nation.

John W. Thiele
Council Chairman

Marvin J. Feldman • Russell H. Graham • Nola Haerle • Caroline Hughes • Thomas A. Jackson • Walter K. Kerr • Viola R. Kretz
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SECTION I

COMPLIANCE OF STATE ADVISORY COUNCILS ON VOCATIONAL EDUCATION (SACVEs)

This Section briefly describes the results of reviews of State Advisory Council's compliance with the requirements of the current law, P.L. 90-576, better known as the Vocational Education Amendments of 1968.

Background

The Bureau of Occupational and Adult Education (BOAE) invited the National Council to participate in the Management Evaluation Reviews for Compliance (MERCs) to be conducted during the 1976-77 school year. Twelve reviews were held, starting with New Jersey (October, 1976), and ending with Alaska (September, 1977). The National Advisory Council on Vocational Education participated in ten of these reviews. In brief, Management Evaluation Reviews assessed the extent to which States were following their approved State Plans, and the degree to which the procedures being followed were consistent with the regulations and the law. Some of the priority areas which gave direction to these assessments were: (1) staff and personnel; (2) fiscal management; (3) planning and coordination; (4) program purposes; (5) State Advisory Council; and, (6) State Board administration and legislative coordination. Drastic non-compliance on priority items could have resulted in the withholding of government funds. However, the primary objective of the reviews was to bring the States into alignment with the law.

Role of the National Advisory Council on Vocational Education

The formal role of the National Advisory Council on Vocational Education (NACVE) in these reviews was to examine the degree of compliance by the State Advisory Council (SAC) with the law. Thus, there was an opportunity for Council Members to become familiar with the issues of compliance and related problems confronting the State Advisory Councils. That is, Council Members felt the pulse of SAC happenings and appreciated situational concerns. When appropriate, the participating Council Member provided advice or follow-up services for a specific problem. Advice was offered after a study of conditions and processes within the organization.

During the MERC activity, there existed an opportunity to informally surface and discuss critical issues generally confronting vocational educators. By so doing the Task Force anticipated that those in responsible positions within the state educational system would accordingly examine their efforts in such areas as duplication, evaluation, and coordination. More specifically, the Members obtained supplementary data on duplication, evaluation, and technical assistance in the course of the ten reviews that should be helpful when deliberating NACVE policy positions (see Appendix A - Questionnaire). The information on duplication confirmed the data gathered for another study and permitted more generalized recommendations.

The Members also had a unique opportunity to observe, assess, and make recommendations concerning BOAE's procedures. Accordingly, staff of the Bureau (BOAE) were asked by NACVE to automatically send to the State Advisory Council the summary of the State's final MERC Report (See Appendix B, Memorandum dated June 29, 1977).

Finally, NACVE will be more adequately prepared to participate in the new MERC + Quality studies by the Bureau. Under Public Law 94-482, BOAE will conduct "... a review analyzing the strengths and weaknesses (currently defined as 'Quality') of the programs ..." in at least ten states a year from October 1, 1977, through September 30, 1982. Continued participation by the National Advisory Council in the expanded process should enable it to analyze more critically the leadership efforts of the Bureau by encouraging the States to carry out the provisions of Public Law 94-482.

Status of SACVE Compliance

A review of the ten final MERC Reports issued by BOAE and materials collected by NACVE disclosed that only three State Councils were out of compliance in two areas or less. The States were the District of Columbia, Iowa, and West Virginia. Alaska was found to be deficient in five compliance areas.

The District of Columbia did not comply with the requirement that its Advisory Council meet within thirty days after certification. Iowa did not certify to the U. S. Commissioner of Education the establishment and membership of its SACVE. West Virginia was not in compliance because (a) it had a member of the State Board on its Advisory Council, and (b) the Council did not have a person representing school systems with large concentrations of disadvantaged students and students of limited English-speaking ability. Alaska's compliance difficulties included not having (a) at least one meeting for the public to express views concerning vocational education, and (b) a certification from the Governor regarding appointment of members who represented specific categories as required by the law.

The review, according to NACVE participants and some State Directors, represented the minimal level of compliance with the regulations. Although the current process uncovered some of the underlying factors that contributed

to or detracted from effective State administration and subsequently local program excellence, a more detailed, comprehensive approach was needed. It is instructive to observe that compliance did not connote program quality. Nor did compliance ensure that the intent and provisions of the law were fulfilled. That is, compliance in and of itself does not guarantee "that persons of all ages in all communities ... will have ready access to vocational training or retraining which is of high quality ..." (Vocational Education Amendments of 1976). Apparently, BOAE officials recognized the deficiency in the current MERC and began the development of an improved method for assessment known as the 'strengths and weaknesses analysis.'

SECTION IV

DUPLICATION

In addition to working with the MERC team, Council Members obtained information on how each State sought to avoid unnecessary duplication between postsecondary and adult vocational education.

Of the ten States presented in this Report, seven used one or more mechanisms to avoid unnecessary duplication. The following chart depicts the scope of effort by each State.

MECHANISMS USED BY STATES TO CONTROL DUPLICATION

States	Mechanisms (X)			
	Coordinating Device	Study to Focus Attention	Hearings or Meetings to Focus Attn.	Legislature: Interest or Action
New Jersey	X	X	-	X
Nebraska	-	X	X	-
Idaho	-	X	-	X
West Virginia	X	-	X	-
Louisiana	NA	NA	NA	NA*
Tennessee	X	-	-	-
Vermont	NA	NA	NA	NA*
Ohio	X	-	-	-
Utah	X	-	-	X
Alaska	-	-	-	-

* NA means not applicable. The postsecondary/adult education system was minimal and therefore there was little, if any, programmatic redundancy. The more detailed information on this issue was used by the Council's Task Force on Duplication.

SECTION III

INDEPENDENT EVALUATIONS AND TECHNICAL ASSISTANCE

Independent Evaluations

The following are expressions by State Advisory Council personnel specifying those operational aspects of vocational education needed independent evaluation.

One State Advisory Council Executive Director indicated that NACVE should conduct an in-depth study within those states where the SACVEs had determined that unnecessary duplication of the vocational programs, in fact, exists. Another idea put forth involved NACVE in auditing SACVE recommendations to determine the effects of same on the State system. Other suggestions included the evaluation of policies and procedures to (a) eliminate sex bias in vocational programs, (b) balance funding among secondary and postsecondary programs, (c) obtain follow-up information about graduates, (d) establish local advisory councils, and (e), monitor the programming of health and cosmetology courses. This information will be used by NACVE in preparing future proposals.

Technical Assistance

NACVE Members queried SACVE personnel in a continuing effort to be aware of and responsive to their needs. Their suggestions are hereinafter summarized. This summary was given to the Technical Assistance Task Force for its use.

It was recommended that NACVE develop audio-visual materials to help local advisory council members understand the extent of their responsibilities. These materials could be presented at regional and/or local workshops for school district advisory members.

The National Advisory Council should become a repository for all SACVE studies and a sounding board for proposed research activities. Thus, NACVE will be in a better position to make suggestions to the State Councils so that any

new activities could profit from the experiences of others.

NACVE is close to the national legislative scene and should keep the SACVEs informed on Congressional concerns and legislation. The Congressional intent for adult vocational programming in correctional and non-correctional institutions presents a case-in-point. Interest was expressed in legislative activities relating to the handicapped, full employment, minimum wage, and the consequent impact of these on the delivery of vocational education.

SECTION IV

SYSTEMIC CONSIDERATIONS

As previously noted, Council Members explored with SACVEs and some state personnel concerns that were exposed during the MERC activity. The presence and authority of the Bureau (BOAE) in these reviews facilitated the identification of problems. However, because these issues were not directly related to compliance, the Bureau did not include them in the final MERC reports. A composite of problems identified only in the ten States visited by Council Members follows.

Funds, in what appeared to be excessive amounts, were carried over because federal money was not made available at the start of previous fiscal years. (BOAE's records showed that the ten State Advisory Councils, identified on page 5 of this Report, carried over an average of 37 percent of their money into FY 1976. The percentage range for carry-over of funds was from two percent to 80 percent.)

Council fiscal records were not periodically audited.

Extension of State administrative policies tended to abridge Councils' autonomy.

Privacy and independence were restricted because State Council offices were housed in the same building as offices for the Vocational Division of the State Department of Education.

Procedures used by the State Departments of Education in some cases limited viable input from the State Advisory Council into the new State Plan.

Governors or State Boards of Education too often refrained from appointing to the Council highly qualified and influential individuals representing the categories designated by the law.

Incomplete data was presented in several Annual Evaluation Reports to justify recommending changes in policies, operations, or administration for programs, services, or activities. (Without a formal, self-assessment, State Councils could have difficulty in identifying the deficiencies in the data.)

Balance or parity of funding between secondary and post-secondary vocational education systems has not been adequately studied.

Cooperative inter-action between the State Department of Education and the State Advisory Council on Vocational Education required continuous nurturing. Through a more open relationship, the Council would be better able to contribute timely advice and critical commentary. (Recommendations from the State Advisory Council on Vocational Education should not be perceived as an intrusion, but rather as an informed communication which provides a forum for discussion.)

SECTION V

RECOMMENDATIONS

Recommendations are based on the experiences of Council Members who participated in the 1976-77 MERC activity. Written materials were also reviewed to confirm their observations. The following recommendations are addressed respectively to the Bureau, State Advisory Councils, and the National Advisory Council.

To the Bureau of Occupational and Adult Education

Maximize current efforts to develop an evaluation model which will be used to analyze (a) the efficiency and effectiveness of the State's administration in carrying out the provisions of Public Law 94-482, and (b) the impact of the local program on the students' vocational progress.

To State Advisory Councils

Review annually the activities and mechanisms put into place by State agencies to control unnecessary duplication.

Send to the National Advisory Council office multiple copies of publications and studies so that a comprehensive library can be developed.

Conduct annual self-assessments which could provide management with specific information on (a) continuity of fiscal responsibility; (b) degree of autonomy; (c) amount of input into the preparation of the State Plan, Annual Program Plan, and the Accountability Report; and, (d) extent of actual cooperation between the Council and the State Department of Education.

To the National Advisory Council on Vocational Education

Conduct independent evaluations in such prime areas as the elimination of sex bias in vocational programs, and the establishment of local advisory councils.

Conduct a national study of State formulae used to allocate funds among secondary and postsecondary programs.

Continuously review and summarize related legislation and Congressional commentary for dissemination to State Advisory Councils on Vocational Education.

Examine the feasibility of developing an audio-visual presentation, which describes (a) the typical kinds of activities performed by a local, state, and national advisory council, and (b) the delivery system (including legislation, funding, planning, and evaluation) for vocational education.

Participate in the Management Evaluation Review for Compliance + Quality activities conducted by the Bureau of Occupational and Adult Education.

APPENDIX A

Questionnaire
Dated January 7, 1977, Revised

January 7, 1977
(Revised)

MEMORANDUM

TO: Members of the MERC Task Force
Dr. Russell Graham
Ms. Caroline Hughes
Ms. Margo Thornley

FROM: T. A. Jackson

RE: Report on MERC Visits

At its December meeting, the Council agreed that an independent report should be forthcoming from each Council Member. Council Members who participate in a Management Evaluation Review for Compliance are requested to submit information on the following topics:

a. duplication (see attached questionnaire)

b. independent evaluation (suggested question -- What aspects of vocational education were identified by State/Advisory personnel as needing independent evaluation(s) by NACVE?)

_____

_____

c. technical assistance (suggested question -- What forms of technical assistance were identified by Advisory personnel that should be provided by NACVE?)

_____

_____

Please explore in depth any topic that you feel would assist future Council activities.

_____

DUPLICATION

GENERAL QUESTIONS FOR NACVE/MERC PARTICIPATION

I. Given the definition, is there duplication of programs in the State? Yes ___ No ___ If no, go to V.

II. If yes, in what geographical area does duplication exist?
a. _____ c. _____
b. _____ d. _____

III. In which of the above areas does unnecessary or unwarranted suplication exist? a. ___ b. ___ c. ___ d. ___

(If you check none of the areas, please go to item V.)

IV. What mechanisms has any state agency established to avoid or minimize unnecessary or unwarranted duplication?

_____

_____

a. What documentation is available that describes the state's efforts in this area? (Laws, hearings, special reports, etc.) The Council Member might visit with personnel to discuss the effectiveness of such mechanisms.

_____

_____

V. If nothing was checked in Items I or III, why does duplication or unnecessary duplication <u>not</u> exist?

_____

_____

_____

FOCUSED QUESTIONS *

Addressed to State Community College Personnel

1. Have you conducted any study(s) of program duplication (postsecondary and adult)? Yes ___ No ___

A. If yes, what did the findings say about duplication? (Obtain copy of study if possible.)

_____

_____

B. If yes, were the recommendations implemented? Yes ___ No ___

i. If yes to B, please provide specific evidence (e.g., letters, directives, policy statements) of the implementation at the state level of the recommendations.

_____

_____

ii. If no to B, please explain why the recommendations were not implemented. Specific inquiry might be directed to whomever made the decision not to implement, and the reasons for that decision.

_____

_____

C. If no to question 1, why has no study been made?

_____

_____

* If time permits, please obtain information as indicated.

_____

Addressed to State Advisory Councils

2. Have you done anything about possible duplication among postsecondary and adult vocational programs in your state?

Yes ___ No ___

A. If yes, what specifically has been done and what are the results (please provide documentation of these efforts)?

B. If no to 2, why hasn't anything been done?

_____

_____

(NOTE: Please request documentation used to support a decision to do nothing.)

_____

Addressed to state education personnel responsible for adult vocational education programs. (In this situation, there might be several program supervisors from each of the vocational disciplines.)

3. Have you conducted any study(s) of duplication among postsecondary and adult programs? Yes ___ No ___

A. If yes, what did the findings say about duplication? (Obtain a copy of the study if possible.)

_____

_____

B. If yes, were the recommendations implemented? Yes ___ No ___

1. If yes to B, please provide specific evidence (e.g., letters, directives, policy statements) of the implementation at the state level of the recommendations.

2. If no to B, please explain why the recommendations were not implemented. Specific inquiry might be directed to whomever made the decision not to implement, and the reasons behind the decision.

_____

_____

C. If no to question 1, why has no study(s) been made? That is, what were the specific reasons for not conducting a study of duplication?

_____

_____

DEFINITIONS

Duplication exists where there are the same or corresponding post-secondary and/or adult ovcational programs (e.g., auto mechar .s) offered by more than one public institution within a commonly served geographic area. These programs are funded all or in part through federal VEA monies.

Postsecondary vocational (occupational) education means vocational education which is designed primarily for youth or adults who have completed or left in preparation for entering the labor market. (That is, the student is registered full time in an approved course of study.)

Adult vocational education means vocational education which is designed to provide training or retraining to insure stability or advancement in employment of persons who have already entered the labor market and who are either employed or seeking employment.

Operational Definitions

Geographic area means that common territory or reasonable commuting distance (25 mile radius) in which clients are served by more than one type of institution.

Corresponding postsecondary and adult vocational programs may be described in terms of:

- facilities
- equipment
- course content
- outcome objectives of program or course

Postsecondary and adult vocational programs/courses may be offered through any of the following public institutional settings:

- community colleges *
- High school (LEA or county) programming for adults
- skill centers
- vocational/technical schools or institutes *
- two year vocational programs in four year institutions *
- similar operations using different institutional titles

NOTE: In designated postsecondary institutions (*) both adult vocational and accredited postsecondary vocational programs may be offered, while other institutions generally would offer only adult vocational programs.

APPENDIX B

Memorandum dated June 29, 1977

C O P Y

18.

C O P Y

MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION AND WELFARE, OFFICE OF EDUCATION

DATE: June 29, 1977

TO: Dr. Ralph Bregman
NACVE

FROM: Chief, PSAOPB, DVTE

SUBJECT: SACVE Included on MERC Distribution

Your suggestion for including the State Advisory Council for Vocational Education on the MERC distribution list was agreed to by Dr. Richard E. Carlson, Director, DVTE, this date.

This means that the MERC summary, complete with copies of worksheets for each item found not in compliance, or in the category of compliance to be determined, as well as a table of contents will be distributed to the SACVE following approval of the full MERC report for each State.

Thank you for the timely suggestion. Your interest and cooperation has helped us make a substantial reduction in excessive paperwork in recent weeks regarding the MERC reports.

Be assured that the MERC report cover letter will include instructions to the SACVE for obtaining a complete copy if desired.

/s/
Albert J. Riendeau